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11 Attorneys for Defendant
12 CADENCE DESIGN SYSTEMS, INC.

13 UNITED STATES DISTRICT COURT
14
15 NORTHERN DISTRICT OF CALIFORNIA
16
17 SAN FRANCISCO DIVISION
18

19 AHMED HIGAZI, on behalf of himself and a
20 class of those similarly situated,

21 Plaintiff,

22 vs.

23 CADENCE DESIGN SYSTEMS, INC.,

24 Defendant.

CASE NO. 3:07-CV-02813 BZ

**DECLARATION OF KANISHKA DE
LANEROLLE IN SUPPORT OF
DEFENDANT CADENCE DESIGN
SYSTEMS INC.'S MOTION FOR
INTRADISTRICT VENUE TRANSFER**

Date: August 22, 2007
Time: 10:00 a.m.
Courtroom: G, 14th Floor
Judge: Hon. Bernard Zimmerman

1 I, Kanishka de Lanerolle, declare:

2
3 1. I am a Senior IT Manager for defendant Cadence Design Systems, Inc. at
4 its headquarters facility located at 2655 Seely Avenue, San Jose, California 95134. I also reside
5 in San Jose, California. I make this declaration in support of Cadence's motion for an intradistrict
6 transfer of venue. I have personal knowledge of the facts set forth below and could and would
7 competently testify to them if called as a witness.

8
9 2. As a Senior IT Manager, I supervise a group of 8-12 Unix and Linux
10 systems administrators in performing direct system-related support activities for the computer
11 systems used by Cadence's San Jose based Engineering/R&D Business Units.

12
13 3. I began serving as the Senior IT Manager on or about June 1, 2001. I was
14 responsible for directly supervising the Plaintiff, Ahmed Higazi, from June 1, 2001, until
15 approximately June 22, 2004. During this entire time, Higazi was assigned to work at Cadence's
16 San Jose facility. While under my supervision, Higazi was responsible for performing IT work
17 on behalf of an R & D business unit at Cadence that was located at Cadence's San Jose facility.
18 His day-to-day job required him to interact, in person, with these R & D employees in San Jose.
19 To the best of my knowledge, he worked at the San Jose facility almost every working day. To
20 the extent he performed any occasional work duties away from San Jose, this was not the norm,
21 and it represented only a small portion of his working time.

22
23 4. While under my supervision, Higazi worked closely with a team of
24 approximately 8-12 co-workers in the IT group, in addition to the R & D personnel for whom he
25 performed IT work. All of these co-workers in both groups were employed at the San Jose
26 facility. Those who still are employed with Cadence today are located at the San Jose facility.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

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4 Executed this 20th day of June, 2007, at San Jose, California.

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KANISHKA DE LANEROLLE

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